

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO GREETING CARD ASSOCIATION INTERROGATORIES  
REDIRECTED FROM WITNESS EMILY ROSENBERG  
(GCA/USPS-T3-41(d) AND 44)**

The United States Postal Service hereby files responses to the above-listed interrogatories of the Greeting Card Association dated March 6, 2012. The interrogatories have been redirected from witness Emily Rosenberg to the Postal Service for the provision of institutional responses. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.  
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
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**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO GREETING CARD ASSOCIATION INTERROGATORY  
REDIRECTED FROM WITNESS ROSENBERG**

**GCA/USPS-T3-41**

In your answer to GCA/USPS-T3- 9. (c), you state that it was realized "that mailers may be able to enter prior to the initiation of DPS processing[.]" To clarify your response, please answer the following questions.

- (a) Please confirm that in the clause quoted above, "mailers" refers only to Pre-sort mailers. If you do not confirm, please explain the scope of the term "mailers" as you used it in your answer.
- (b) Did the feedback and comments referred to in your response include any views or discussion of Single-Piece mail? If so, please describe any such views or discussion of which you are aware.
- (c) If your answer to (a) was to confirm that Presort mailers are considered able to enter prior to initiation of DPS processing, please explain why collection mail, such as local mail, could not be entered at a similar time, for example by adjusting pickup times as necessary?
- (d) If Presort bureaus can pick up and sort collection mail as well as bulk mail on Monday and submit it to USPS on Monday prior to initiation of DPS processing, why could not the Postal Service deal similarly with collection mail under the proposed plan?

**RESPONSE:**

- (a-c) [Responses provided by witness Rosenberg.]
- (d) It is not clear whether the presort bureaus alluded to in the question operate collection systems that, combined, cover as much geographical area or as many collection points as the Postal Service does or what their collection frequencies may be. Nor is it clear from the question whether the presort bureau collection times and routes accommodate only specific commercial customers or the mailing habits of the public at large throughout the service area of each postal Sectional Center Facility. Accordingly, it is not clear on what basis other than a hypothetical one for purposes of this question that

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**RESPONSE to GCA/USPS-T3-41 (continued)**

the Postal Service should assume that Presort bureaus now provide or, under the new postal network, would or could provide a level of morning collection service that approached being regarded as universal.

See the response of witness Neri to GCA/USPS-T4-24. Even assuming the Postal Service could establish a morning collection Day Zero Critical Entry Time for overnight single-piece First-Class Mail service based on its ability to initiate DPS processing of such collection mail on the day it was collected, there remains the unexamined question of the general impact on customers of shifting from what could be regarded as the traditional late afternoon CET to an early morning CET in order to obtain overnight single-piece First-Class Mail. If mailers who currently produce mail for deposit later in the day simply continue that practice in the hypothetical morning CET scenario in the new network, their mail would not be picked up until the CET the next morning. If DPS processing is initiated the day of pickup, the mail would be delivered the day after pickup, which would be two days after deposit.

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**GCA/USPS-T3-44**

In GCA/USPS-T3-12 (c) and (d), the intent of the questions was to postulate a service standard change *only* for the late-arriving mail, with other mail being handled under the current standard. Your answers appear to assume that the question postulated no service standard change for any mail. With this clarification in mind, please answer questions (c) and (d), or redirect the question to an appropriate witness.

**RESPONSE**

The First Class Mail service standard matrix reflects relationships between origin 3-digit ZIP Codes and destination 3-digit ZIP Codes. Assume end-to-end network First- Class Mail with a 1-day service standard arrives on Day 1 at 1 AM to the destination processing plant. In today's environment, the mail is processed for delivery the same that that it arrived at the destination processing plant (Day 1 delivery).

The question postulates that some of this mail should be held and processed for Day 2 delivery. This violates the 3-digit ZIP Code to 3-digit ZIP Code First-Class Mail service standard, as all volume from one 3-digit ZIP Code to another has the same service standard. To abide by this rule, the 3-digit ZIP Code pair would need to take on the maximum service days to delivery.

For example:

Day 0 (prior to CET): A First-Class Mail letter is entered in a collection box.

Day 0: The letter is cancelled (in general until about 9:30 PM).

Day 0: The letter receives outgoing sort.

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**RESPONSE to GCA/USPST3-44 (continued)**

Day 1: Dispatch of value to destination plant (~1:30 AM, earlier trips may have transported mail that finished processing earlier in the evening)

Day 1: Arrive destination plant after 01:30 AM,

Question proposed this volume is delivered Day 2

Currently, this volume delivered Day 1

Based on questions, all origin-destination ZIP Code pairs would need to be downgraded to a 2 day First-Class Mail service standard, since the start the clock for all pieces is the same.